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Compliance-focused EMS for Colleges and Universities


Environmental Management Systems:
The Next Generation

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Presented by:
Susan Pendleton
ENSR International
spendleton@ensr.com




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Presentation Objective

- *Why EMS?*
- *Compliance-focused EMS Model*
- *Tips for implementation*




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Why EMS?

- *Compliance audit corrective actions = short term fix*
- *Need to identify root cause(s) to fully address issues*
- *Best mechanism for compliance assurance on a sustained basis*





EMS Models - ISO 14001

- *Developed for international use*
- *Environmental aspects and “significant” aspects at core of management system*
- *Significant aspects*
 - ❖ *Subject to Operational Control Procedures*
 - ❖ *Subject to Monitoring and Measurement*
 - ❖ *Considered when selecting Objectives and Targets*





ISO 14001 - the “Downside”

- *Heavy emphasis on “beyond compliance” prevention of pollution, objectives and targets*
- *Potential disconnect between environmental aspects and regulatory requirements*
- *Environmental aspects review can be a barrier*
- *Focus on “complying” with ISO 14001*





Consider: A Compliance-focused EMS

- *Clarity of objective = compliance assurance*
- *A suitably ambitious goal for most C/Us*
- *An important baseline - establish the infrastructure upon which prevention of pollution, “beyond compliance” or green campus initiatives may be based*





The Compliance-focused EMS Model: Alignment with ISO 14001

- Policy
- Legal and Other Requirements
- Training
- Communication
- Roles and Responsibilities
- Records and Document Control
- Monitoring and Measurement
- Operational Controls
- Facility Change Management
- Emergency Preparedness and Response
- Audits
- Management Review





Compliance-focused EMS and ISO 14001: Another Perspective

Significant Environmental Aspects = Regulatory Requirements

- ❖ *Operational Control Procedures (SOPs)*
- ❖ *Monitoring and Measurement*
- ❖ *Objectives and targets for improvement*






Compliance-focused EMS: Track A Compliance Management Systems

- *Identify applicable regulations*
- *Identify regulatory requirements or “tasks”*
- *Develop SOPs for compliance tasks*




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A Word on Effective SOPs

- “Who does what, when”
- Optimum level of detail
- Include:
 - ❖ Responsibilities
 - ❖ Procedure
 - ❖ Records
 - ❖ Training
- Increased compliance obligations?
- Ineffective without supporting management system infrastructure




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Compliance-focused EMS: Track B management systems development

- Compliance audit
- Root cause analysis
- EMS baseline review and implementation plan
- EMS development (by element)
- Build the EMS to support the implementation of the SOPs




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EMS as the Infrastructure to Support the Implementation of SOPs

- System for tracking applicable regulations
- Defined roles and responsibilities
- Change management procedure
- System for internal audits
- Document control system (including review and update)
- Training programs
- Communication





Tips for EMS Implementation

- *Management commitment*
- *Who is the “champion?”*
- *Establish cross-functional Core Team*
- *Consider a pilot study - area (e.g., Department) or issue (e.g., chemical waste handling)*
- *Build upon existing systems, where possible*





Conclusion

- *An EMS is essential for long-term compliance assurance*
- *Compliance-focused EMS Model aligned with ISO 14001 provides structure*
- *Break down regulatory requirements into tasks and develop SOPs*
- *Build EMS elements to support implementation of the SOPs*